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July 2, 2014

Via Email

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Environment & Natural  
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Senior Attorney  
Delaware Riverkeeper Network  
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Re: Status Report No. 1

Dear Ms. Morris, Ms. Kolman, Ms. Rivera, and Mr. Mulvihill:

Pursuant to paragraph B.3 of the Interim Settlement Agreement between the West Goshen Sewer Authority ("the Authority"), the United States Environmental Protection Agency, and the Delaware Riverkeeper Network, the Authority provides the representatives of the parties with the attached semi-annual status report regarding the Authority's efforts to make interim reductions in its discharge of phosphorus to Goose Creek.

The work described in this status report is separate and in addition to the Authority's work to develop a work plan, design quality assurance protocols, and conduct sampling and field work in support of EPA's reassessment of whether Goose Creek is impaired due to nutrients.

Please let me know if you have any questions about this work or the Authority's work in connection with the reassessment.

Yours truly,

  
Steven T. Miano

cc: Ross A. Unruh, Esq.

**Status Report No. 1**  
**July 6, 2014**

**Work Completed to Date**

1. Engineer and staff reviewed plant operation and prepared a schedule to test, monitor, and record several options for potential chemical feed points to decrease phosphorus levels.
2. Authority personnel met with representatives of manufacturers of phosphorus removal technology to evaluate the potential for using such technology in the plant.
3. Authority personnel met with representatives of Hach Company, a manufacturer of water quality analysis products, to determine potential locations for portable continuous monitoring phosphorus meters. Several locations between processes in the treatment plant were evaluated.
4. Authority personnel visited several treatment plants with phosphorus removal systems to evaluate whether similar systems might be applicable and effective in the Authority's plant.
5. Authority staff and engineers have designed and planned a testing process to determine the effect the filtrate in the biosolids dewatering presses has on phosphorus levels. This effort involves multiple steps, including utilizing digesters to re-treat filtrate from the plant's belt filter presses and varying the chemical feed dosage to the filtrate to evaluate dosage impact.

**Work Planned for the Next Six Months**

1. Authority personnel intend to locate and visit other treatment facilities with innovative phosphorus removal systems, such as the treatment plant in York, Pa, to evaluate such systems' potential applicability.
2. Authority personnel will continue to test, monitor, and record phosphorus levels at various locations in the plant to determine potential points in the treatment process where intervention might be effective.
3. Authority personnel intend to implement the filtrate testing process as described above.
4. Authority personnel intend to conduct an additional series of tests to evaluate the impact of varying chemical feed dosage at various points in the treatment process.